

## **EXHIBIT 108**

### **Declaration of Vishal Reddy**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA  
CASE NO. 1:14-CV-954**

**STUDENTS FOR FAIR  
ADMISSIONS, INC.,**

**Plaintiff,**

**v.**

**UNIVERSITY OF NORTH  
CAROLINA et al.,**

**Defendants.**

**DECLARATION OF VISHAL REDDY**

## DECLARATION OF VISHAL REDDY

I, Vishal Reddy, hereby make this declaration from my personal knowledge and, if called to testify to these facts, could and would do so competently:

### **Background**

1. I graduated in May 2016 from The University of North Carolina at Chapel Hill ("UNC-Chapel Hill" or the "University") with a Bachelor of Arts in Anthropology and minors in Chemistry and Spanish. I am currently working as a Campus Coach for Open Doors Academy, facilitating after-school programming for middle schools in Cleveland, Ohio. Down the line, I plan to be a public interest attorney.

2. I am an Indian male, and I was born in Canada but raised in Cleveland, Ohio.

3. In high school, I narrowed my college choices down to UNC-Chapel Hill, Northwestern University, The Ohio State University, and McGill University. At the time, I wanted to attend a public university because public institutions seemed to have more pride in their school and sports teams than private universities. UNC-Chapel Hill was farther from home but even as an out-of-state student, it was affordable compared to other schools like Northwestern University.

### **Experience at UNC-Chapel Hill**

4. From a nostalgic perspective, what UNC-Chapel Hill graduates remember most about their time at the University is sitting outside on a sunny afternoon at the Pit, a social gathering spot in the heart of campus. The Pit provides a lens into UNC-Chapel

Hill student life. The breadth of student activities is incredible, from dance groups to multicultural fraternities to service organizations. As I saw at UNC, if you have a diverse student body, it likely results in diverse student interests. Having diverse interests at the University is very powerful and can incubate passions that lead to innovative, progressive thinking. If we are attempting to raise a new generation of leaders, diversity is critical to facilitate that kind of thinking.

5. At UNC-Chapel Hill, I was very involved with social justice endeavors. I encouraged people to volunteer, to go abroad, to support public health, and to generally be involved in my larger advocacy efforts, such as raising issues with the Board of Governors and the North Carolina Legislature.

6. I was actively involved with the Campus Y, UNC's Center for Social Justice on campus. During my senior year, I served as Co-President of the Campus Y.

7. During my sophomore year, I joined the student organization, Helping Youth by Providing Enrichment ("HYPE"). I Co-Chaired the organization my junior year. I served as a tutor, going twice-a-week to afterschool community centers in local low-income neighborhoods. This experience helped me realize UNC was a bubble that did not sufficiently reflect the real world. I first started tutoring because I enjoyed working with kids, but I soon realized different patterns of inequality. I started seeing poverty in Chapel Hill and became intellectually curious about the causes of poverty.

8. During my senior year, I signed up as an Editorial Board Member for the *Daily Tar Heel*. It was a great opportunity, and there were so many voices in the room

that brought different perspectives, from staunch socialism to ardent conservatism. The position allowed me to have a macro understanding of people's perspective on what was happening on campus and in Chapel Hill. We talked a lot about diversity, service, advocacy, and the UNC and North Carolina administration.

9. My friends were not all social-justice-minded like I was. I had different pockets of friends from different groups. In my first year, I met many of my friends in my residence hall. I lived on South Campus my first year, and it was an incredible experience. I met some of my best friends there, and they are from a variety of races, places, and socioeconomic statuses. I also found that student organizations were a great way to get involved, both as a member and as a leader. As a member, I interacted and became friends with different tutors and people who were interested in working with educational initiatives in Chapel Hill. There was a racially diverse group of tutors, which I found to be very enlightening. As a leader of HYPE, I often met and coordinated with other racially-diverse leaders. Many of the projects we worked on had to do with diversity, which was a great experience as we were able to confront together the difficult questions of race and class.

10. I was enrolled in a couple of Anthropology and Sociology classes that addressed, amongst other issues, how concepts like racism became institutionalized. I started to think more critically about power structures and our relationship to them. I took these classes at the same time as I was volunteering and serving in the Chapel Hill community. The intellectual and moral impact this work had on me was exacerbated

because I was fortunate enough to take classes that helped provide a framework through which to understand poverty and class struggles.

11. One class that stands out to me was Society and Medicine, taught by Dr. Liana Richardson. We talked about systemic, institutional racism and micro-aggressions from a public health perspective. This was before those terms became commonplace to me, and it was impactful to learn about them from an academic perspective instead of just learning them through informal conversations with friends or on social media. I was the only male in the class, with 34 women, and there was significant racial diversity. When we discussed intersectionality, it was helpful to hear about the experience of a Black woman from a middle class background and how those three identities shaped her experience. The professor was half-Black and the teaching assistant was Chinese-American. Being that there were a diverse set of identities represented by our class, it was fascinating to hear how people identified themselves. It was also great to hear White classmates talk about their responsibility, experience, and accountability. When discussing issues that are happening in the world, it is critical to have people from different parts of the world in the discussion.

12. One of the biggest ways you can grow is through conversations with friends and with people in class. If all of your friends share the same background, you will operate in a silo. I think everyone can agree that the more perspectives you bring into an issue and a discussion, the more enlightening that discussion is for everyone. If we are talking about racism, it is one thing for me as an Indian male to offer a perspective and

another to have the perspective of a Black woman or a White man. It is important to hear not just the Black experience but also the White experience, and it is important for both of those people to hear each other's perspectives. Through these dialogues, people become more tactful, aware, and empathetic when they encounter people from different backgrounds. It is an enlightening experience if you come to UNC-Chapel Hill from one section of America and encounter people who have had and will continue to have different life experiences from you.

### 13. Conclusion

When I came to UNC-Chapel Hill, I thought it would be a great college experience, and I knew that UNC-Chapel Hill had a terrific basketball team. It was indeed a great college experience, but, looking back four years later, I think completely differently about what tenets of a public university make it valuable. From my experience, public universities have a responsibility to make sure students are educated about the world, which means not insulating them from the world. Having racial diversity at UNC-Chapel Hill is an important part of that. Students need the opportunity to hear other perspectives.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed on: 7/21/17

  
Vishal Reddy